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**BY ECF**

Hon. Ramon E. Reyes, Jr.  
United States District Judge  
United State District Court  
Eastern District of New York

Hon. Marcia M. Henry  
United States Magistrate Judge  
United State District Court  
Eastern District of New York

Re: *Adam White v. Sholem Klein, et al., 23-cv-06924 (RER)(MMH)*

Judge Reyes and Judge Henry:

I am co-counsel for Plaintiff Adam White. Attached are the following:

1. Rule 68 Offer of Judgment from Defendants City of New York and all of the individual NYPD member Defendants (the “City Defendants”) dated December 20, 2024, with proof of timely acceptance thereof;
2. A proposed Judgment against the City Defendants consistent with the City Defendants’ Offer of Judgment;
3. Rule 68 Offer of Judgment from Defendant Sholem Klein dated February 21, 2025, with proof of timely acceptance thereof; and
4. A proposed Judgment against Defendant Klein consistent with his Offer of Judgment.

Plaintiff respectfully asks that the Court enter the proposed Judgments.

The parties will negotiate in efforts to resolve the remaining claims in the case related to Plaintiff’s attorney’s fees, costs, and expenses, without intervention from the Court, and Plaintiff will file a fee application, if necessary, within 60 days of entry of the Judgments.

Thank you for the Court’s attention to this matter.

Respectfully submitted,

/S/

Gideon Orion Oliver